

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

ESTATE OF LANE CAVINESS, *et al.*,

Plaintiffs,

v.

ATLAS AIR, INC., *et al.*,

Defendants.

Case No. 22-cv-23519-KMM-LFL

**DECLARATION OF JONI D. FFRENCH ON BEHALF  
OF FLIGHT SERVICES INTERNATIONAL, LLC**

I, Joni D. Ffrench, hereby declare:

1. I am over the age of eighteen (18) years and am fully competent to make this Declaration. The facts set forth within this Declaration are based upon my personal knowledge.

2. I am the only officer of Defendant, Flight Services International, LLC (“FSI”) and hold the position of Manager.

3. FSI provides flight attendants to airlines.

4. I reside in Houston, Texas. I am not now, nor have I ever been, a citizen of, or domiciled in, Florida.

5. FSI is a Texas limited liability company with its principal (and only) place of business in Houston, Harris County, Texas.

6. FSI’s offices and business records are located in Texas.

7. FSI does not now, nor has it ever, owned, leased/rented, possessed, or maintained any real property in Florida.

8. FSI does not now, nor has it ever owned, leased/rented, possessed, or maintained

an office in Florida.

9. FSI does not now, nor has it ever, maintained a bank or financial account in Florida.

10. All financial, accounting, and operational decisions for FSI are made in Texas.

11. FSI's state of formation is Texas.

12. The Federal Aviation Administration (FAA) requires FAA-certified flight attendants to participate in recurrent training for two [2] days annually. For FSI flight attendants, that training takes place at Atlas Air, Inc.'s Miami, Florida training facility. In addition, when FSI hires employees, they undergo new hire training for approximately five (5) weeks at the same Miami, Florida training facility.

13. Since FSI's formation, none of the Plaintiffs who are or were employed by FSI were or are based in Florida. Correspondingly, all FSI flight attendants, as a condition of employment, must relocate to within seventy-five (75) miles of Houston, Texas.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 6, 2023

s/ Joni D. Ffrench  
Joni D. Ffrench, Manager of FSI